

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., <i>et al.</i> ,)	Case No. 25-10068 (CTG)
)	(Jointly Administered)
Debtors.)	

**NOTICE OF APPEARANCE AND
DEMAND FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appear on behalf of Sun-Yin (HK) Holding Ltd., ("Sun-Yin (HK)"), and demand, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Sections 1109(b) and 342 of Title 11 of the United States Code, as amended, that all notices given in the above-captioned cases and all papers served or required to be served in the above-captioned cases be given to and served upon the undersigned attorneys, at the address set forth below:

Michael Busenkell, Esq.
Gellert Seitz Busenkell & Brown, LLC
1201 North Orange Street, Suite 300
Wilmington, Delaware 19801
Telephone: (302) 425-5812
Facsimile: (302) 425-5814
Email: mbusenkell@gsbblaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Code or Bankruptcy Rules, but also includes, without limitation, orders and notices of any applications, motions, orders, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing, and any other document brought before this Court with respect to the Bankruptcy Case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, telex, e-mail or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive the Sun-Yin (HK)'s (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Sun-Yin (HK)'s, is or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: January 22, 2025

**GELLERT SEITZ BUSENKELL &
BROWN, LLC**

/s/ Michael Busenkell

Michael Busenkell (DE 3933)

1201 North Orange Street, Suite 300

Wilmington, DE 19801

Telephone: (302) 425-5812

Facsimile: (302) 425-5814

Email: mbusenkel@gsbblaw.com

Counsel to Sun-Yin (HK) Holding Ltd.